

Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Implementation of the Local)	CC Docket No. 96-98
Competition Provisions of the)	
Telecommunications Act of 1996)	
)	
Petition of Southwestern Bell Telephone)	
Company, Pacific Bell, and Nevada Bell)	
For Expedited Declaratory Ruling on)	NSD File No. 98-121
Interstate IntraLATA Toll Dialing or, in)	
The Alternative, Various Other Relief)	

REPLY COMMENTS OF PACIFIC BELL AND NEVADA BELL

PACIFIC BELL
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List A B C D E

April 16, 1999

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SUMMARY

It is operationally impossible for Pacific Bell and Nevada Bell to meet the May 7, 1999 intraLATA toll dialing parity implementation date. Pacific Bell and Nevada Bell cannot complete all the necessary systems changes by that date, and Pacific Bell cannot complete the required modifications on *all* of its 5ESS switches by that date.

The proposals to implement intraLATA toll dialing parity "piece-meal" – everywhere in California and Nevada except California LATA 730 on May 7, 1999 – would only further complicate the process and would delay implementation beyond June 15, 1999 (Pacific Bell's and Nevada Bell's requested date).

The Pacific Bell and Nevada Bell proposed June 15, 1999 implementation date cannot be shortened as suggested by Sprint and AT&T. Hard-coded software modifications to system programs must be manually inputted and the process is not subject to a "learning curve." Maintenance and preventative maintenance functions prevent systems being available for changes 24 hours a day, 7 days a week, and such unavailability means they can only be worked on for other purposes for approximately 87 business days during a typical 120 calendar day implementation period.

The Pacific/Nevada Bell systems are code driven systems and require more programming and more testing than the Southwestern Bell table driven systems. Thus, they require considerably more implementation time (120 days).

A five-week extension of the May 7, 1999 implementation deadline is not "drastic relief" and is being sought by Pacific Bell and Nevada Bell for unique operational, not anticompetitive, reasons.

Pacific Bell's intent to file an amended intraLATA toll dialing parity plan with the California Public Utility Commission (California PUC) on April 22, 1999 is *not* an attempt to extend the requested June 15, 1999 implementation date. It is necessary to

make the California plan conform to and comply with this Commission's March 23 implementation guidelines.

The Pacific Bell and Nevada Bell petition for waiver filed in September 1998 is not moot. The companies require more time to make the necessary changes and cannot complete them under any circumstances by May 7, 1999, even if ordered to do so. That is simply not possible given the unique nature of the Pacific/Nevada Bell systems, and given all of the work that is required.

The recommendation by the General Counsel of the Public Utilities Commission of Nevada (PUCN) that implementation be "as soon as possible" is contrary to the PUCN's previous and only "public interest" finding that such implementation should be delayed, and the PUCN General Counsel's comment that "Nevada Bell made no argument" that it could not implement any sooner is contradicted by the direct testimony of Nevada Bell witness, Nancy Forst, in PUCN Docket No. 98-11010 (March 15, 1999).

The contentions that the Pacific Bell and Nevada Bell additional waiver requests are part of a SBC grand strategy to delay intraLATA toll dialing parity and to deter intraLATA toll competition are completely undermined by the fact that SBC has not filed requests similar to this one in any of its five SWBT States.

The Commission should grant the Pacific Bell and Nevada Bell requests and petition for additional waivers.

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REPLY COMMENTS OF PACIFIC BELL AND NEVADA BELL

Pacific Bell and Nevada Bell hereby reply to the comments of AT&T, MCI Worldcom, Sprint and the General Counsel of Public Utilities Commission of Nevada (PUCN) in opposition to the petition of Pacific Bell and Nevada Bell for additional waivers of this Commission's intraLATA toll dialing parity rules. Pacific Bell and Nevada Bell seek an extension of the date for implementing intraLATA toll dialing parity in California and Nevada from May 7, 1999 to June 15, 1999. Despite their best efforts to distort and mislead, AT&T, MCI Worldcom and Sprint cannot change the fact that it is operationally impossible for either Pacific Bell or Nevada Bell to meet the May 7, 1999 implementation date. The PUCN General Counsel also ignores this fact and erroneously claims that it was not argued to the PUCN, when the PUCN's own staff considered that very argument (and the testimony supporting it) and joined with others in recommending that Nevada Bell be given until June 15, 1999 to implement intraLATA toll dialing parity in Nevada.

I. NEITHER PACIFIC BELL NOR NEVADA BELL CAN COMPLETE THEIR SYSTEMS CHANGES BY MAY 7, 1999, AND PACIFIC BELL CANNOT COMPLETE ALL OF ITS SWITCH MODIFICATIONS BY THAT DATE.

MCI Worldcom makes much about Pacific Bell 's alleged ability to make changes to most of its switches to make them full 2-PIC capable by May 7, 1999. (MCI comments, p. 8). Like MCI Worldcom, AT&T contends there is no basis for a blanket waiver and that Pacific Bell and Nevada Bell should have to implement intraLATA dialing parity in all areas, outside of California LATA 730, on May 7, 1999. (MCI comments, pp. 4-5; AT&T comments, p. 7).

What these claims ignore, and what our declarations make clear, is that the ability of Pacific Bell to implement intraLATA dialing parity is not only affected by switch changes, but more importantly by all the systems changes that must now be revised and tested in order for simultaneous interstate intraLATA and intrastate intraLATA toll dialing parity to occur. These same systems changes must also be made for Nevada Bell which utilizes the same systems as Pacific Bell. Although Sprint claims otherwise (Sprint comments, p. 2), these 41 systems changes are described in great detail, along with the number of business days required to complete them, in the sworn declaration of Nevada Bell witness, Nancy Forst. Ms. Forst is an Information Technology Systems Project Manager for Persona Computing and was retained by Pacific Bell and Nevada Bell to evaluate and provide testimony on the required modifications to their Operation Support Systems (OSSs) to implement full intraLATA toll dialing parity.

Nor can all the switching changes be completed in California LATA 730 (the Los Angeles and California's most populous LATA) by May 7, 1999. As sworn to and stated in the declaration of Violeta Diaz, a Technology Engineer for Pacific Bell in its department of Network Planning and Engineering, the translations work in the 58 5ESS switches will take approximately 90 days to complete. (Diaz, p. 6). Pacific Bell began that work on March 15, 1999. *Id.*

II. ADOPTING THE AT&T AND MCI PROPOSALS TO BEGIN "PIECE-MEAL" IMPLEMENTATION WOULD REQUIRE EVEN MORE SYSTEMS CHANGES AND WOULD DELAY IMPLEMENTATION BEYOND JUNE 15, 1999.

To implement as suggested by AT&T and MCI Worldcom (*i.e.*, on a piece-meal basis) would only introduce further delays. At this point, the systems changes and switch modifications are well underway.¹ The Pacific Bell and Nevada Bell systems are hard-coded in COBOL and UNIX software programs that require logic changes and require considerable manual programming to implement an ordering, billing and service change based upon dialing pattern. That is why Pacific Bell and Nevada Bell initially sought a waiver and a ruling by October 15, 1998, because if they were going to be required to implement interstate-only intraLATA toll dialing parity on February 8, 1999, they needed approximately 120 days to make all of the required systems changes.² Similarly, if Pacific Bell and Nevada Bell were to now stop what they've been doing so that all but the California LATA 730, could be implemented on May 7, 1999, the process would have to be restarted and the systems recoded and reprogrammed, such that they would not be able to implement by the requested June 15, 1999 date. Also, to do California and Nevada on different dates would be likely to slow the process because it would require selective edits to the systems to distinguish between California orders and Nevada orders. Hence, it is more efficient and faster to implement all at once.

III. THE IMPLEMENTATION PERIOD CANNOT BE SHORTENED AS SUGGESTED BY SPRINT AND AT&T.

Sprint speculates that the systems changes can be accomplished earlier based upon the Pacific Bell and Nevada Bell "learning curves." (Sprint comments, p. 2). But our request for a waiver is based on the "experience provided" (Diaz, p. 3, para. 7) in the

¹ Nevada Bell started making the systems changes in February 1999 after being urged to do so by the Staff of the PUCN. Pacific Bell began making the switching and systems changes in March 1999.

² Pacific Bell initially thought it would take less time (only a week) to modify the 5ESS switches when in practice it ended up taking several weeks in some cases. (Diaz, pp. 5-6).

earlier work. Pacific Bell and Nevada Bell staff already know how to do coding and programming and had that knowledge when they started the conversion to interstate-only intraLATA dialing parity. The time consumed is in actually "doing the work" and manually entering and making the systems changes. It is not in learning how to do programming.

AT&T speculates that the 120-day period could be shortened by more than a month if implementation work is also performed on evenings and weekends, and claims there is a discrepancy between the 120 days and the declaration that it can be done in 87 business days. (AT&T comments, p. 8). AT&T well knows that these major systems require maintenance and are not available 7 days a week, 24 hours a day. That is particularly true of these systems which process millions of bills per month and handle hundreds of thousands of service orders each month. The changes to these systems must be made without jeopardizing our ability to provide services. It is unreasonable for AT&T to suggest that such systems can operate properly if there is no down time for maintenance and preventative maintenance, and such maintenance is why there are only 87 business days of availability in an implementation period of 120 days.

IV. THE PACIFIC/NEVADA BELL SYSTEMS ARE DIFFERENT FROM THE SWBT SYSTEMS AND REQUIRE MORE CHANGES AND TESTING.

AT&T questions why Pacific Bell's affiliate (Southwestern Bell Telephone Company or "SWBT") can implement by May 7, 1999 in States where it has approved dialing parity plans when Pacific Bell and Nevada Bell cannot do so in California and Nevada. (AT&T comments, p. 9, n. 22). The reason for the difference is actually very simply explained. SWBT and Pacific/Nevada Bell use different systems. SWBT's systems are table driven and can be updated fairly easily on a State-by-State and NPA-NXX basis. The Pacific/Nevada Bell systems, on the other hand, are code driven, which means changing them requires writing in commands and doing considerable programming changes to the logic which direct different operations. In other words,

changing the Pacific/Nevada Bell systems takes considerably longer than it does to change the SWBT systems. Also, the testing for code programming is much more extensive than for tables because code programming involves a greater possibility for errors.

V. A FIVE-WEEK EXTENSION IS NOT DRASTIC AND IS NOT BEING SOUGHT FOR ANTICOMPETITIVE REASONS.

Sprint claims that, if Pacific Bell's "ploy is successful, intraLATA toll dialing parity will be delayed for up to several months." (Sprint comments, p. 4). MCI Worldcom makes a similar claim and contends SBC's conduct is both anticompetitive and abusive. (MCI comments, pp. 4, 5, and 9). In fact, Pacific Bell and Nevada Bell have sought an extension of only five weeks; from May 7, 1999 to June 15, 1999. What further rebuts the claim that this is part of an "anticompetitive" strategy is the fact that SBC has only sought relief for two of its seven states.³ That reinforces the fact that this waiver is technically and operationally driven, and is specific to the unique requirements of Pacific Bell and Nevada Bell.

VI. PACIFIC BELL'S INTENT TO FILE AN AMENDED PLAN IN CALIFORNIA IS NOT MEANT TO FURTHER EXTEND THE REQUESTED JUNE 15, 1999 ADDITIONAL WAIVER DATE.

AT&T and Sprint make much of Pacific Bell's intention to file an amended dialing parity plan with the California PUC on April 22, 1999, and contend that is a "ploy" to delay implementation of intraLATA dialing parity in California even further. (AT&T comments, pp. 4-5; Sprint comments, p. 3). Pacific Bell is filing a revised plan with the California PUC, not to delay, but because the plan which the California PUC previously approved in April 1997 cannot be implemented without amendment. For

³ SBC has already begun the process of implementing full intraLATA toll dialing parity in the states of Texas, Oklahoma and Kansas where (unlike California and Nevada) such implementation is both operationally possible and technically feasible. SWBT's other states - Missouri and Arkansas - do not have state approved plans and, thus, are on a different schedule. SNET had already implemented intraLATA toll dialing parity.

example, the April 1997 plan contained customer notice requirements that cannot be accomplished within the time frames required by this Commission.⁴ The April 1997 plan also contained a provision on parity performance penalties which assumed that when the plan was implemented, a Pacific Bell affiliate would be providing interLATA services in California. Obviously, that will not be the case, so that provision needs to be removed from the plan.

If Pacific Bell's purpose in filing a revised plan with the California PUC was solely to delay implementation, it would not be requesting an implementation date of June 15, 1999. As MCI Worldcom correctly points out, the schedule for LECs without plans is for them to file plans with their respective state commissions by April 22, 1999. State commissions then have up to 60 days to approve the implementation plan, which the LEC must then implement within 30 days thereafter (*i.e.*, by July 22, 1999). (MCI comments, pp. 2-3). Thus, if Pacific Bell's purpose in filing an amended plan was to restart the clock, it would be requesting an implementation date of July 22 rather than June 15. That Pacific Bell is not requesting July 22 was made clear in comments filed on the Draft Decision On Dialing Parity with the California PUC on April 6, 1999, and in its reply comments on the Draft Decision.⁵ The reply was filed the day before the AT&T and Sprint comments were filed in this proceeding, and it demonstrates the willingness of Pacific Bell and Nevada Bell to comply with the spirit of this Commission's March 23 Order to the nearest extent possible.

⁴ The 45-days prior customer notice requirement contained in the April 1997 plan cannot be accomplished by May 7, 1999.

⁵ Pacific Bell's reply in this regard stated: "We will file a revised dialing parity plan by April 22, 1999 that will meet the 30-day implementation requirement in the FCC Order. The Commission [CPUC] can adopt that plan on May 15, 1999 and we can implement intraLATA presubscription on June 15, 1999, consistent with the schedule in the FCC Order." Also, if Pacific Bell were requesting July 22, it would need a waiver in addition to this one from the FCC.

VII. THE PACIFIC BELL AND NEVADA BELL SEPTEMBER 1998 WAIVER PETITION WAS NOT AND IS NOT MOOT AND THE BUREAU WAS INFORMED OF THE OPERATIONAL ISSUES AND REQUIREMENTS.

Finally, SBC is criticized for not having implemented interstate intraLATA dialing parity on February 8, 1999, for not withdrawing its September 1998 waiver petition, and for not notifying the Commission that the basis for its petition had changed. (MCI comments, pp. 5-6).

The SWBT, Pacific Bell and Nevada Bell September 1998 petition – which sought a waiver of the February 8, 1999 interstate intraLATA dialing parity requirement – was not and is not moot. In fact, as copies of the attached *ex partes* show, it was being given serious consideration in December 1998 and into late January 1999 until the Supreme Court released its decision in *AT&T Corp. v. Iowa Utilities Board*.

The Bureau was made fully aware of the operational difficulties that Pacific Bell and Nevada Bell would have in implementing an interstate-only intraLATA dialing parity decision, which is why they had originally requested a ruling on their initial waiver petition by October 15, 1998, so that they would have close to 120 days to make the necessary changes.⁶ When, of course, they did not have the waiver by October 15, 1998, they began to make the changes necessary to implement interstate-only intraLATA dialing parity. Pacific Bell and Nevada Bell stopped making those changes in January 1999 when it appeared that a decision granting a waiver until March 31, 2000 could be imminent. Systems work had to begin all over again when the Supreme Court released its decision. The Bureau was also made aware of Pacific Bell's and Nevada Bell's unique

⁶ October 30, 1998 letter from Lincoln E. Brown to Magalie Roman Salas, ("intraLATA interstate pre-subscription would necessitate a duplicate programming effort") ("Pacific Bell situation is exceptionally extreme.") December 2, 1998 letter ("Impact on Network And OSSs. Extensive (And Expensive)") ("Required Network Activity.") December 22, 1993 letter ("alternative intraLATA interstate toll dialing parity implementation timetable.") January 19, 1999 letter. February 24, 1999 letter from Gregory J. Vogt to Magalie Salas ("a minimum of 120 days is needed for implementation after a state approves a dialing parity plan due to massive reprogramming of software and switches").

requirements and that they would need approximately 120 days to implement any change in the intraLATA presubscription requirements.⁷

VIII. THE PUCN GENERAL COUNSEL'S COMMENTS ARE BOTH FALSE AND MISLEADING.

The General Counsel of the PUCN comments that Nevada Bell should be ordered "to implement intraLATA toll dialing parity as soon as possible and not to exceed the FCC's date of May 7, 1999." (PUCN Comments, p. 1). The position advocated by the General Counsel has not heretofore been a topic of discussion by the PUCN in its public agenda meetings. Moreover, it contradicts a previous PUCN decision on the same subject. The PUCN previously held that it was "in the public interest" for Nevada Bell's implementation of intraLATA toll dialing parity to be "coincident with Nevada Bell's own or its affiliate's entry into the in-region interLATA market." Compliance Order, Docket No. 97-2010, May 12, 1999=7, p. 3. That public interest holding has yet to be changed by any PUCN order.

Moreover, it is utterly false and misleading to claim that in PUCN Docket No. 98-11010, "Nevada Bell made no argument with respect to why an earlier date which might be chosen by the FCC should be extended." (PUCN comments, pp. 1-2). To the contrary, the record in Docket No. 98-11010 before the PUCN was replete with testimony containing the reasons Nevada Bell could not implement intraLATA toll dialing parity in Nevada before June 9, 1999. Nevada Bell witness, Nancy Forst, provided detailed testimony showing why Nevada Bell could not comply any earlier date in PUCN Docket No. 98-11010, and has provided additional explanation and detail in the declaration she provided in this proceeding. And for the reasons provided by Ms. Forst and Nevada Bell in PUCN Docket No. 98-11010, the PUCN Regulatory Operations Staff, as well as the

⁷ February 24, 1999 Vogt letter, *supra*. As noted earlier, SWBT table driven systems do not have the same requirements, which explains why SWBT has not joined in the Pacific Bell and Nevada Bell request for additional waivers.

Nevada Attorney General's Office of Consumer Advocate, recommended that Nevada Bell should be allowed until June 15, 1999 to implement intraLATA toll dialing parity in Nevada.⁸

IX. CONCLUSION

For all of the above reasons, the Commission should reject the oppositions of AT&T, MCI Worldcom, Sprint and the PUCN General Counsel to the Pacific Bell and Nevada Bell petition for additional waivers. Nothing in their comments changes the need for such waivers. The Commission should also reject the suggestions to implement intraLATA dialing parity on a "piece-meal" basis, everywhere but in California LATA 730, because that will restart the whole process and would require another set of system changes. Allowing Pacific Bell and Nevada Bell to proceed as they have proposed and granting them an additional waiver until June 15, 1999 to implement intraLATA toll dialing parity is the only reasonable way to proceed.

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April 16, 1999

⁸ Direct Testimony of Sharon Thomas (March 15, 1999), Docket No. 98-11010; Transcript of Proceedings, March 22, 1999, pp. 26, 31-31.

Certificate of Service

I, Mary Ann Morris, hereby certify that the foregoing "Reply Comments of Pacific Bell and Nevada Bell," in CC Docket No. 96-98, NSD File No. 98-121 has been served on April 16, 1999 to the Parties of Record.



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